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Attorneys for Defendant
NATIONWIDE INSURANCE COMPANY OF
AMERICA

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

AHMER BILAL, INC. dba TIRE DEPOT,
Plaintiffs,

vs.

NATIONWIDE INSURANCE COMPANY
OF AMERICA; and DOES 1 through 30,
inclusive,
Defendants.

Case No. 2:20-cv-00788-TLN-DMC

**STIPULATION AND ORDER
REGARDING CASE MANAGEMENT
SCHEDULE**

Action Filed: March 20, 2020

Plaintiff Ahmer Bilal, Inc. dba Tire Depot, and defendant Nationwide Insurance Company of America (collectively, the “Parties”), by and through their respective counsel of record, hereby stipulate and agree as follows, and respectfully request the Court approve their stipulation for good cause shown:

WHEREAS, on August 3, 2021, this Court issued a Minute Order directing the parties to

1 comply with a Scheduling Order that had been issued on April 17, 2020, which had been listed in
2 the Docket under the heading “New Case Documents Issued,” and attached as the Main
3 Document (Docket 2) with two exhibits (Docket 2-1 and Docket 2-2);

4 WHEREAS, upon removal of the action to federal court on April 16, 2020, the legal
5 assistant for defendant’s counsel downloaded, docketed and served on plaintiff the items posted
6 at Docket 2-1 and Docket 2-2, but made an error and did not download, docket and serve the
7 Main Document, which was the Scheduling Order itself (Docket 2);

8 WHEREAS, the Parties respectfully request a continuance of the current case deadlines
9 to allow time for discovery, motion practice, settlement discussions and trial preparation;

10 WHEREAS, the Parties stipulate and respectfully request the Court adopt the following
11 revised Status (Pretrial Scheduling) Order:

12	Non-expert Discovery Cut-Off:	May 10, 2022
13	Designation of Expert Witnesses	July 11, 2022
14	Designation of Rebuttal Experts	August 10, 2022
15	Expert Discovery Cut-Off:	August 8, 2022
16	Discovery Motion Hearing Cut-Off	October 20, 2022
17	Joint Notice of Trial Readiness	30 days after MSJ Ruling

18 **IT IS SO STIPULATED.**

19 Dated: August 5, 2021

RICHARDS LAW FIRM, APLC

21 By

/s/ Evan Willis

22 EVAN WILLIS
JOHN T. RICHARDS

23 Attorneys for Plaintiff
24 AHMER BILAL, INC. DBA TIRE DEPOT
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1 Dated: August 5, 2021

DENTONS US LLP

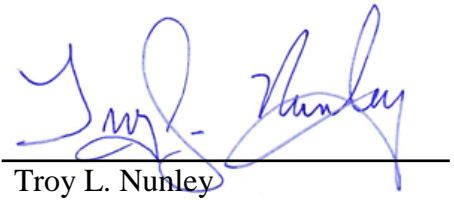
2
3 By: /s/Sonia Martin

SONIA MARTIN

4 Attorneys for Defendant
5 NATIONWIDE INSURANCE COMPANY OF
6 AMERICA

7 **IT IS SO ORDERED.**

8
9
10 Dated: August 6, 2021

11 
12 Troy L. Nunley
13 United States District Judge

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